

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE, LUKE LOE, RICHARD ROE, and  
MARY MOE, individually and on behalf of all others  
similarly situated,

Plaintiffs,

-against-

THE TRUMP CORPORATION, DONALD J.  
TRUMP, in his personal capacity, DONALD TRUMP,  
JR., ERIC TRUMP, and IVANKA TRUMP,

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Defendants.

Index No. 18-cv-9936 (LGS)

**DECLARATION PURSUANT TO  
LOCAL RULE 1.4**

I, Bradley Pollina, declare and state as follows:

1. I am a former associate of Spears & Imes LLP, counsel for all defendants in this action.
2. On May 3, 2019, my employment with Spears & Imes LLP ended.
3. I will no longer serve as counsel of record for defendants in this action.
4. Pursuant to Local Civil Rule 1.4, I respectfully request that Your Honor grant this application to remove my name from the docket as counsel of record for all defendants and that all email notifications sent to my attention in connection with this matter cease.
5. All defendants continue to be represented by Joanna C. Hendon, a partner of Spears & Imes LLP, and Cynthia Chen, an associate of Spears & Imes LLP. Ms. Hendon and Ms. Chen are presently the other attorneys of record for defendants in this matter and are familiar with the facts and proceedings herein.
6. At this time, discovery is stayed and defendants' motion to dismiss is pending.
7. I am not asserting a retaining or charging lien in connection with this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: New York, New York  
May 8, 2019

Respectfully submitted,

/s/ Bradley Pollina

Bradley Pollina